

Supporting Statement for FERC-516: Electric Rate Schedules and Tariff Filings

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-516: Electric Rates and Tariffs (OMB No. 1902-0096) for a three-year period. The Commission is proposing to renew and administratively consolidate a number of electric tariff collections under FERC-516. There are no proposed changes to any of the ongoing reporting requirements in any of the merged collection. In addition, the collection is being updated to remove one-time collections that no longer need to be submitted.

The FERC-516 information collection is associated with filings that are submitted to the Commission to regulate electric rates and tariffs, which provide the Commission and the public with information regarding utility rates and service conditions. Without tariffs, FERC and the public would not be able to properly evaluate rates. This collection currently consists of 15 information collection activities that support regulating the electric rates and tariffs.

The Commission conducted an in-depth review of information collections related to electric tariffs and identified several collections that were unnecessarily separated into distinct collections, as well as information collection instruments that were completed or no longer needed. The Commission proposes to consolidate these information collection activities under FERC-516, its primary electric tariff information collection, so that we can accurately reflect the burden placed on the public. In addition, the Commission is merging the burden of the temporary collections FERC-516E (Electric Rate Schedules and Tariff Filings - NAESB Standards - Electric) and FERC-516J (Project Area Labor Wage Data) into FERC-516. FERC is also renewing all of the relevant information collections to harmonize their expiration dates under FERC-516. Once the information collection activities are incorporated into FERC-516, then the Commission will discontinue the other collections as they will no longer be needed.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Federal Power Act (FPA) (16 U.S.C. §§ 791 *et seq.*) is the primary federal statute governing the wholesale transmission and sale of electric power. The Commission is obligated under Section 205 and Section 206 of the FPA to regulate electric rates and tariffs. This includes an obligation to remedy unjust, unreasonable, and unduly discriminatory or preferential rates, terms, and conditions of transmission service. Regulated entities are required to submit tariffs, rates, fares, and charges of public utilities providing electric interstate transmission and other jurisdictional services. The FPA requires respondents that are subject to 18 CFR 35.28 to submit

compliance filings.¹ Regulated entities are also required to share information on transmission prices and availability,² and to retain records related to their activities including reliability and safety.

2. HOW, BY WHOM, AND FOR WHAT PURPOSE THE INFORMATION IS TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION

The information collected through FERC-516 is used by FERC to carry out its statutory obligations under sections 205 and 206 of the Federal Power Act (FPA) to regulate electric rates, tariffs, and jurisdictional service terms. The Commission uses these filings to evaluate proposed changes to tariffs, rates, and charges; ensure that rates remain just, reasonable, and not unduly discriminatory; and review compliance filings associated with pro forma Open Access Transmission Tariffs (OATTs), Large Generator Interconnection Agreements (LGIAs), and Small Generator Interconnection Agreements (SGIAs). These materials are reviewed by Commission staff across program offices responsible for rate regulation, tariff administration, reliability oversight, and cost-of-service evaluations. The information is also used by states, regional entities, market participants, and the public to evaluate market conditions, assess price transparency, and make informed regulatory, investment, and operational decisions.

Without this information, the Commission would be unable to determine whether jurisdictional rates and tariff provisions comply with federal law, hindering its ability to remedy unjust or unreasonable practices. If FERC did not have this collection, it would also impair the Commission's ability to evaluate cost-of-service elements—such as labor costs and depreciation inputs—which support rate determinations and ensure transparency and fairness for transmission customers. Failure to collect this information would ultimately impede regulatory oversight, reduce market transparency, and limit the Commission's capacity to ensure just and reasonable rates. Without this information, states, market participants, and the public would face reduced price transparency, weaker ability to assess market fundamentals, diminished confidence in market fairness, and higher risks of undetected anticompetitive or discriminatory practices.

¹ 16 U.S.C. 824e.

² Order No. 889.

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED TECHNOLOGY TO REDUCE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN.

The Commission implements its eTariff system for the electronic filing of tariffs. More information on eTariff is posted at <https://www.ferc.gov/ferc-online/etariff>.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2.

The Commission's rules and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates. This includes a review of the Commission's regulations and data requirements to identify duplication. The information to be submitted, generated, retained, or posted is not available from other sources.

5. METHODS USED TO MINIMIZE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES

Under the Small Business Administration's classification,³ the six Regional Transmission Operators and Independent System Operators (RTOs/ISOs) would be considered electric bulk power transmission and control, for which the small business size threshold is 950 or fewer employees. Because each RTO/ISO has more than 950 employees, none are considered small entities. Other respondents are generally not considered small entities. FERC minimized burden for all entities, including small entities, by using electronic filing and allowing combined filings.

6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY

The Commission requires this information to perform its mandated oversight and review responsibilities with respect to electric transmission rates being just and reasonable. Without this information, the Commission would be unable to meet its statutory responsibility under the FPA to ensure that electric utility rates and tariffs are not unjust, unreasonable, or unduly discriminatory or preferential. Failing to meet this responsibility could result in public utilities charging rates that are not just and reasonable.

³ 13 CFR 121.201 (2026) (Sector 22, Utilities).

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There is one special circumstance related to this information collection. OMB's guidelines at 5 CFR 1320.5(d)(2)(iv) direct that agencies should not require respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years. The Commission requires that respondents retain records for a period of five years. This is necessary to ensure consistency with the Energy Policy Act of 2005 anti-manipulation provisions and the generally applicable five-year statute of limitations where the Commission seeks civil penalties for violations of the anti-manipulation rules or other rules, regulations, or orders to which the price information may be relevant.

8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS

In accordance with OMB requirements, the Commission published a 60-day notice (91 FR 38418, June 25, 2026) and a 30-day notice (91 FR55564, August 28, 2026) to the public regarding this information collection. The Commission noted that it would consolidate multiple collections into FERC-516 and would request a three-year extension of the public reporting burden with no change to the existing record retention requirements. No comments were received.

The regulations covered by FERC-516 are often updated, which provides the public with many opportunities to comment on the requested information and burden estimates. In the last three years, this includes RM05-5-31, RM22-2-000, RM22-14, PL24-1, and RM20-16. Summaries of any comments are included in those dockets.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission makes no payments or gifts to respondents as part of this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission does not consider the information collected in FERC-516 filings to be confidential. However, an entity that chooses to seek confidential treatment of the information may submit a request for the Commission to treat this information as confidential and non-public, consistent with 18 CFR 388.112.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE

There are no questions of a sensitive nature associated with the reporting requirements.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

As part of its in-depth review of these information collection activities, FERC identified three categories of information collection requirements that cover all previous information collection activities: Electric Tariff Filings, Compliance Filings, and Information Sharing Requirements. The Electric Tariff Filings and Compliance Filings are triggered by a respondent's activities rather than a predictable schedule based on the number of potential respondents. The previous approach overestimated the burden because it did not account for the frequency of responses based on FERC's historical records. Therefore, FERC determined that it could more accurately reflect the number of respondents for these information collection activities by using the number of actual submissions from previous years. While the electric market is always adapting to new circumstance, the number of submissions is roughly consistent over the last 5 years. Therefore, the number of historic annual submissions provides a reasonable of the number of submissions per year in the next three years. FERC also reviewed the estimated number of hours for each information collection activity and determined that the burden hours are driven by complexity of an entity's proposed change, which cannot be predicted by FERC. As such, FERC is confident that an average across this wider group of activities still represents an appropriate estimated burden. The Information Sharing Requirements are based on the number of entities subject to an information sharing requirement. The Commission estimates the annual public reporting burden for the combined FERC-516 information collection as:

	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response ⁴ (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
Electric Tariff Filings – Common filings	4,355	1	4,355	100 hrs. \$10,200	435,500 hrs. \$44,421,000	\$10,200
Electric Tariff Filings – Long Term Transmission	1	1	1	1,180 hrs. \$120,360	1,180 hrs. \$120,360	\$120,360
Compliance Filings – Common Filings	3,377	1	3,377	12 hrs. \$1,224	40,524 hrs. \$4,133,448	\$1,224
Compliance Filings – Regional Planning with OATT	221	1	221	1,434 hrs. \$146,268	316,914 hrs. \$32,325,228	\$146,268
Information Sharing Requirements	1,879	1	1,879	95 hrs. \$9,690	178,505 \$18,207,510	\$9,690
TOTAL			9,833		972,623 hrs. \$99,207,546	

Electric Tariff Filings category –

The Electric Tariff Filings category includes all tariff requests, tariff revisions and rate change applications, as well as Change in Status Filings, Triennial Filings, and Notices of Succession and Cancellation for sellers with existing authorization. These filings are part of the Commission’s processes to grant market-based rate authorization for wholesale sales of electric energy, capacity, and ancillary services by sellers that can demonstrate that they and their affiliates lack or have adequately mitigated horizontal and vertical market power.

⁴ The estimates for cost per response are derived using the following formula: Average Burden Hours per Response * \$102 per Hour = Average Cost per Response. The hourly cost figure comes from the Commission’s average salary and benefits for FY2026. FERC estimates that respondents require a similar mix of skills as the Commission in responding to Information Collections.

Compliance Filings category –

FERC’s electric tariff compliance filings are a core regulatory mechanism through which jurisdictional utilities, RTOs/ISOs, and other market participants demonstrate adherence to Commission-approved requirements under the FPA and Title 18 of the CFR. These filings ensure that the terms, rates, and conditions of wholesale electric service remain just, reasonable, and not unduly discriminatory, and that changes mandated by Commission orders or rulemakings are accurately implemented.

Relevant jurisdictional public utilities and electric transmission providers must submit compliance filings when the Commission issues an order or rule that directs specific tariff changes or requires utilities to update previously filed tariff records. These filings are triggered by the utility’s activities and the timing of FERC directives rather than by a predetermined schedule, and they must be submitted within the deadlines established in the relevant order or regulation. The burden for any compliance filing depends on the individual entity’s circumstances and the complexity of their filing related to the directive or regulation.

Information Sharing Requirements category –

FERC’s electric tariff information sharing requirements apply primarily to RTOs and ISOs, which must share credit related information with one another so they can accurately assess market participants’ credit exposure and respond quickly to credit events. The rule does not require entities to submit this information to FERC; instead, each RTO/ISO must maintain tariff provisions that enable information sharing and then facilitate that sharing according to its own processes. This includes that public utilities must operate an OASIS site, which provides all transmission customers with equal and timely access to information about transmission availability, prices, and terms of service and ensures transparency and nondiscriminatory access.

Please see the Federal Register notices for additional information on these categories are related to the previous FERC Forms.

Removed Information Collection activities

Information collection activities are removed when the underlying regulatory obligations have already been fully completed, or when later rules or policy updates render those activities unnecessary or obsolete. FERC regularly reviews information collections to identify those that have been overtaken by regulatory updates, superseded by newer requirements, or no longer needed for oversight.

Previous FERC Form	Title	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden per response⁵ (4)	Total Annual Burden Hours (3)*(4)=(5)
516	Reform of Generator Interconnection Procedures and Agreements, RM17-8, Non-RTO/ISO (Ongoing Filing)	162	4	648	4	2,592
516	Reform of Generator Interconnection Procedures and Agreements, RM17-8, RTO/ISO (Ongoing Filing)	6	4	24	4	96
516	Updates to Interconnection Procedures and Agreements per Final Rule RM22-14 (One-Time)	44	7	308	32.95	10,149 ⁶
516	Compliance Filing (FR RM22-2)	43	1	43	4	172
516	Essential Reliability Services and the Evolving Bulk-Power System -- Primary Frequency Response, RM16-6 (Ongoing Filing)	74	1	74	10	740
516A	Compliance Filing (RM22-2) FR	43	1	43	4	172
516A	Interconnection Reforms_RM22-14_Alternative Technologies (One-Time)	44	1	44	29.33	1,291 ⁷
516A	Update	44	2	88	1	88

⁶ Rounded

⁷ Rounded

Previous FERC Form	Title	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden per response (4)	Total Annual Burden Hours (3)*(4)=(5)
	Interconnection Procedures and Agreements (Rehearing Order RM22-14)					
917	RM21-17: Seek agreement from the states to establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process (Year 1)	48	1	48	390	18,720
TOTAL				1,320		34,020 hrs.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no non-labor or Paperwork Reduction Act (PRA)-related costs. All costs are related to burden hours and are addressed in Questions #12 and #15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The information collection costs to the Federal government include the costs of systems for receiving the information, as well as the preparing this data for use by FERC staff.

The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA⁸ for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings, other changes to the collection, and publications in the Federal Register.

The chart below represents the existing estimated annualized cost to the federal government for FERC-516.

⁸ 5 CFR 1320.

FERC-516	Number of Employees (Full-Time Equivalents [FTE])	Estimated Annual Federal Cost
Receipt and preparation of FERC-516 data for use ⁹	5 ¹⁰	\$1,065,015
PRA Administrative Cost		\$8,404
FERC Total		\$1,073,419

15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

The Commission is proposing to renew and consolidate a number of electric tariff collections under FERC-516. There are no proposed changes to any of the ongoing reporting requirements except to update the burden estimate to reflect historic submission records; however, the collection is being updated to remove a number of one-time collections that no longer need to be submitted. While a number of ICs will be added to FERC-516, they are merely being moved from other collections and FERC anticipates discontinuing those collections after the FERC-516 Information Collection Request is completed. The burden change shown in ROCIS is reflected in the columns marked “516 only”. However, a holistic review of the collections being merged together into FERC-516 reflects a decrease in both the number of responses and burden.

	Total Request	Previously Approved (all relevant collections)	Previously Approved (516 only)	Change due to Adjustment in Estimate (all relevant collections)	Change due to Adjustment in Estimate (516 only)
Annual Number of Responses	9,833	16,033	8,103	-6,200	1,730
Annual Time Burden (Hours)	972,623	1,190,702	555,161	-218,079	417,462
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

The tariff and compliance submissions are public and can be viewed through FERC’s website. Filing are marked private only by the company if they contain material that is CEII. There are no tabulating or statistical analysis or publication plans for the collection of information. The data are used for regulatory purposes only.

⁹ FERC’s estimate incorporates the Commission’s FY 2026 average salary plus benefits of \$213,003 per year (or \$102/hour).

¹⁰ The number of FTEs is the agency’s best estimate for all information collection activities of FERC-516.

17. DISPLAY OF THE EXPIRATION DATE

FERC provides the OMB Control Numbers of the information collections along with their expiration dates on this site at [Information Collections | Federal Energy Regulatory Commission \(ferc.gov\)](https://www.ferc.gov/information-collections).

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.